## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

CARLOS FERRELL	)
Plaintiff,	) ) ) No.
vs.	) ) JURY DEMAND
CITY OF COOKEVILLE, a political subdivision and authorized by the State of Tennessee; COOKEVILLE POLICE DEPARTMENT, a law enforcement department of the City of Cookeville;	) JURY DEMAND ) ) ) )
JEFF JOHNSON, CHIRS MELTON, JOSH WARD, MYKE GREEN, CHRIS WILLIAMS, and JOHN DOES #1 & 2, all Police Officers of the Cookeville Police Department;	) ) ) )
PUTNAM COUNTY, a political subdivision and authorized by the State of Tennessee; PUTNAM COUNTY SHERIFF'S DEPARTMENT, a law enforcement department of the County of Putnam;	) ) ) ) ) ) ) ) )
JOHN DOES # 3 & 4, each Sheriff's Deputies of the Putnam County Sheriff's Department;	) ) )
Defendants	) )

## PLAINTIFF'S ANSWER TO COUNTER CLAIM OF CITY OF COOKEVILLE AND COOKEVILLE POLICE DEPARTMENT

Comes now the Plaintiff and responding numerically to the allegations contained in Defendants' Counter Claim would show unto this Honorable Court the following:

- 1. Denied.
- 2. Denied.
- 3. Denied. Strict proof of this allegation is demanded.

DAVID RANDOLPH SMITH #01905 1913 21st Avenue South Nashville, TN 37212

## ATTORNEYS FOR PLAINTIFF